

# DELPHI

## FACILITY INVESTIGATIVE REPORT

### APPENDIX A

### SECTION 3

CONT. SITE CHARACTERIZATION AND REMEDIAL ACTION PLAN 2-12

PHASE I ENVIRONMENTAL ASSESSMENT

13-50



CHEMICAL RESEARCH LABORATORIES

# LABORATORY REPORT

11531 SEABOARD CIRCLE (214) 598-0458  
STANTON, CA 90680 (714) 698-5370

FROM: James & Moore  
312 Alacapa Street  
Santa Barbara, CA 93101  
ATTN: Mr. Tony Nelson

ANALYSIS NO.: 861218-68/69  
SAMPLING DATE: 12/18/86  
DATE SAMPLE REC'D: 12/18/86  
INVOICE NO.: 18553

NATURE OF SAMPLE:

De'co Bery - Anaheim, CA (soil)

## RESULTS in mg/kg

SAMPLE IDENTIFICATION	TOTAL LEAD	TOTAL PETROLEUM HYDROCARBONS (EPA 418.1)
SP 3	46.	9,300.
SP 2	42.	13,700.

Note: Samples were received in a chilled state, intact and with chain of custody record attached.



CHEMICAL RESEARCH LABORATORIES

## LABORATORY REPORT

31 SEABOARD CIRCLE (213) 598-0458  
LANTON, CA 90680 (714) 898-6370

Dames & Moore  
812 Anacapa Street  
Santa Barbara, CA 93101  
ATTN: Mr. Tony Nelson

ANALYSIS NO.: 861218-58/69  
SAMPLING DATE: 12/18/86  
DATE SAMPLE REC'D: 12/18/86  
INVOICE NO.: 18663

NAME OF SAMPLE:

Delco Remy - Anaheim, CA (soil)

SAMPLE ID

pH, in units

SP 8

10.77

SP 9

10.45

NOTE: Samples were received in a chilled state, intact and with chain of custody record attached.

# LABORATORY REPORT

CENTRAL RESEARCH LABORATORIES

11531 SEABOARD CIRCLE (213) 508-0458  
STANTON, CA 90680 (714) 898-6370

FROM: James & Moore  
812 Anacapa Street  
Santa Barbara, CA 93101  
ATTN: Mr. Tony Nelson  
NATURE OF SAMPLE:  
DeJco Remy - Job #14397-002-042 (SOIL)  
ANALYSIS NO: 861229-2/7  
SAMPLING DATE: 12/28/86  
DATE SAMPLE RECD: 12/29/86  
INVOICE NO:

SAMPLE IDENTIFICATION  
TOTAL PETROLEUM HYDROCARBONS (EPA 418.1)

RESULTS, in mg/kg

SP-11	97,100.
SP-12	48,800.
SP-13	6,100.
SP-14	430.
SP-15	20.
SP-16	21.

NOTE: Samples were received in a chilled state, intact and with chain of custody record attached.



CHEMICAL RESEARCH LABORATORIES

# LABORATORY REPORT

11631 SEABOARD CIRCLE (213) 898-0458  
STANTON, CA 90680 (714) 898-6370

FROM: James & Moore  
812 Anacapa Street  
Santa Barbara, CA 93101  
ATTN: Mr. Tony Nelson

ANALYSIS NO: 861229-2/7  
SAMPLING DATE: 12/28/86  
DATE SAMPLE REC'D: 12/29/86  
INVOICE NO:

NATURE OF SAMPLE:

Deico Remy - Job #14397-002-042 (soil)

## SAMPLE IDENTIFICATION

SP-11  
SP-12  
SP-13  
SP-14  
SP-15  
SP-16

## RESULTS, in mg/kg

### ORGANIC LEAD

22.

17.

3.3

\*ND(0.1)

\*ND(0.1)

\*ND(0.1)

Not Detected (below indicated limit of detection).

Note: Samples were received in a chilled state, intact and with chain of custody record attached.

CHEMICAL RESEARCH LABORATORIES

**LABORATORY  
REPORT**

1831 SEABOARD CIRCLE (214) 898-0458  
STANTON, CA 96680 (714) 898-6370

James E. Moore  
813 Anacapa Street  
Santa Barbara, CA 93101  
ATTN: Mr. Tony Nelson

ANALYSIS NO. 861229-2/7  
SAMPLING DATE 12/28/86  
DATE SAMPLE REC'D: 12/29/86  
INVOICE NO.

NATURE OF SAMPLE:

Delco Remy - Job #14397-002-042 (soil)

SAMPLE I.D

PH, in units

SP-11	10.82
SP-12	10.96
SP-13	11.37
SP-14	11.63
SP-15	11.42
SP-16	11.23

Note: Samples were received in a chilled state, intact and with chain of custody attached.



CHEMICAL RESEARCH LABORATORIES

## LABORATORY REPORT

11631 SEABOARD CIRCLE  
STANTON, CA 90680

(213) 598-0458  
(714) 898-8370

FROM: Dames & Moore  
612 Anacapa Street  
Santa Barbara, CA 93101  
ATTN: Mr. Tony Nelson;

ANALYSIS NO.: 861230-14/17  
SAMPLING DATE: 12/30/86  
DATE SAMPLE REC'D: 12/30/86  
INVOICE NO.:

NATURE OF SAMPLE:

Delco Remy - 1201 N. Magnolia, Anaheim (soil)

RESULTS, in mg/kg

SAMPLE IDENTIFICATION

TOTAL LEAD

Sample #17

4.5

Sample #18

2.7

Sample #19

3.5

Sample #20

3.0

\*Note: Samples were received in a chilled state, intact and with chain of custody record attached.



CHEMICAL RESEARCH LABORATORIES

## LABORATORY REPORT

1631 SEASIDE CIRCLE (213) 598-0458  
STANTON, CA 90680 (714) 698-6370

FROM: Dames & Moore  
812 Anacapa Street  
Santa Barbara, CA 93101  
ATTN: Mr. Tony Nelson

ANALYSIS NO: 861231-49/51  
SAMPLING DATE: 12/31/86  
DATE SAMPLE REC'D: 12/31/86  
INVOICE NO:

NATURE OF SAMPLE:

Delco Remy - Soil

### RESULTS, in mg/kg

#### SAMPLE IDENTIFICATION

#### TOTAL PETROLEUM HYDROCARBONS (EPA 418.1)

SP-21

5.

SP-22

6.

SP-23

11.

NOTE: Samples were received in a chilled state, intact and with chain of custody record attached.



CHEMICAL RESEARCH LABORATORIES

## LABORATORY REPORT

11631 SEABOARD CIRCLE (213) 598-0458  
STANTON, CA 90680 (714) 898-6370

FROM: James & Moore  
812 Anacapa Street  
Santa Barbara, CA 93101  
ATTN: Mr. Tony Nelson  
NATURE OF SAMPLE:

ANALYSIS NO.: 861231-49/51  
SAMPLING DATE: 12/31/86  
DATE SAMPLE REC'D: 12/31/86  
INVOICE NO.:

Delco Remy - spill

### RESULTS, in mg/kg

#### SAMPLE IDENTIFICATION

#### TOTAL LEAD

SP-21

5.7

SP-22

7.6

SP-23

11.

Note: Samples were received in a chilled state, intact and with chain of custody record attached.



CHEMICAL RESEARCH LABORATORIES

## LABORATORY REPORT

11531 SEABOARD CIRCLE (213) 588-0458  
STANTON, CA 90680 (714) 898-6370

FROM: Dames & Moore  
812 Anacap Street  
Santa Barbara, CA 93101  
ATTN: Mr. Tony Nelson

ANALYSIS NO.: 861231-49/51  
SAMPLING DATE: 12/31/86  
DATE SAMPLE REC'D: 12/31/86  
INVOICE NO.:

NATURE OF SAMPLE:

Delco Remy - sol.

SAMPLE ID

pH, in units

SP-21	11.27
SP-22	11.04
SP-23	11.44

$$\bar{X} = 11.01$$
$$S = .56$$

Note: Samples were receive in a chilled state, intact and with chain of custody attached.



CHEMICAL RESEARCH LABORATORIES

## LABORATORY REPORT

11831 SEABOARD CIRCLE (213) 598-0458  
STANTON, CA 90680 (714) 898-8370

Dames & Moore  
FROM: 812 Anacapa Street  
Santa Barbara, CA 93101  
ATTN: Mr. Tony Nelson

ANALYSIS NO.: 700525-001  
SAMPLING DATE: 12/28/86  
DATE SAMPLE REC'D: 01/06/86  
INVOICE NO.:

NATURE OF SAMPLE:

Delco Remy SP 13 (soil)

EPA METHODS 624/8240 VOLATILE POLLUTANTS DATA SHEET

	mg/kg		mg/kg
Chloromethane	<0.05	1,2-Dichloropropane	<0.02
Bromomethane	<0.05	Trans-1,3-Dichloropropene	<0.02
Vinyl Chloride	<0.05	Trichloroethene	<0.02
Chloroethane	<0.05	Dibromochloromethane	<0.02
Ethylene Chloride	0.29 *	1,1,2-Trichloroethane	<0.02
Acetone	0.09 *	Benzene	<0.02
Carbon Disulfide	<0.02	cis-1,3-Dichloropropene	<0.02
1,1-Dichloroethene	<0.02	2-Chloroethylvinyl ether	<0.05
1,1-Dichloroethane	<0.02	Bromoform	<0.02
Trans-1,2-Dichloroethene	<0.02	4-Methyl-2-Pentanone	<0.05
Chloroform	<0.05	2-Hexanone	<0.05
1,2-Dichloroethane	<0.02	Tetrachloroethene	<0.02
2-Butanone	<0.05	1,1,2,2-Tetrachloroethane	<0.02
1,1,1-Trichloroethane	<0.02	Toluene	0.08
Carbon Tetrachloride	<0.02	Chlorobenzene	<0.02
Vinyl Acetate	<0.05	Ethylbenzene	<0.02
Bromodichloromethane	<0.02	Styrene	<0.02
		Total Xylenes	<0.02

— Present in laboratory blanks

Denotes compound was not detected above the value indicated.



# ANAHEIM FIRE DEPARTMENT FIRE PREVENTION

201 S. Anaheim Boulevard, Suite 300  
Anaheim, CA 92805  
(714) 765-4040/FAX (714) 765-4608

9/14

## RECORD SEARCH-REQUEST FOR INFORMATION

Company Name: DELTA CRV Date: 9-1-05  
Contact Name: BILL VIERA  
Address: 1201 N MAGNOLIA AVE  
City: ANAHEIM State: CA Zip: 92801  
Phone: 714 300-5598 Fax No.: 714 761 5088  
Address(es)

1201 N. MAGNOLIA

### Environmental Protection Section

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> Copies of Chemical Inventory   | <input checked="" type="checkbox"/> UST List (complete) | <input type="checkbox"/> Correspondence/Referrals      |
| <input type="checkbox"/> Inspection Reports   | <input checked="" type="checkbox"/> Investigation       | <input type="checkbox"/> On-site Treatment Information |
| <input type="checkbox"/> Risk Management Plan   | <input type="checkbox"/> Reports/Complaints             | <input type="checkbox"/> Business Emergency Plan       |
| <input type="checkbox"/> Hazardous Waste Generator Information  |   |  |
| <input checked="" type="checkbox"/> Underground Storage Tank (UST) Information, including Permit to Operate<br>(UST records prior to 1991, contact the County of Orange Health Care Agency, Custodian of Records at 714-834-3536) |   |  |
| <input checked="" type="checkbox"/> UST Clean-Up Information<br>(UST Clean-Up Information only, contact the City of Anaheim Public Utilities Department at 714-765-4238)  |   |  |

### Life Safety

#### (Fire Inspection & Plan Check Information)

- |   |   |   |
|---|---|---|
| <input type="checkbox"/> Inspection/General Information | <input type="checkbox"/> Complaints               | <input type="checkbox"/> Correspondence |
| <input type="checkbox"/> Violations                     | <input type="checkbox"/> Fire Code Permits Issued | <input type="checkbox"/> Other _____    |
| <input type="checkbox"/> Plan Check Submittals/Plans    |   |   |

### Fees

Photocopies  
\$0.10 per page

Microfiche  
\$0.20 per page

I agree to pay the postage for mailing, as well as the fees for photocopies:

Bill Viera  
(Signature)

Please note that we will not provide site maps, chemical locations, trade secrets, financial information, or owner's personal phone numbers. These items will be blocked out or removed. If these are necessary for your review, a certified release of information letter from the business in question must be presented with your request.

For office use only

Date: 9/7/2005 Amount Due: \$ 9.40 Amount Received: \$ 9.40

Method: ☐ Check # \_\_\_\_\_ ☐ Credit Card # \_\_\_\_\_ ☒ Cash 9.40

**PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST**

## **PHASE I ENVIRONMENTAL SITE ASSESSMENT**

**DELPHI CORPORATION  
ANAHEIM BATTERY OPERATIONS  
1201 N. MAGNOLIA AVE.  
ANAHEIM, CALIFORNIA**

**Prepared For:  
Delphi Corporation**

**NOVEMBER 2004  
REF. NO. 37616-01 (2)**  
This report is printed on recycled paper.

PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST

TABLE OF CONTENTS

	<u>Page</u>
1.0 INTRODUCTION.....	1
2.0 ENVIRONMENTAL DATABASES SEARCH AND HISTORICAL RECORDS SEARCH.....	3
2.1 ENVIRONMENTAL DATABASES SEARCH .....	3
2.1.1 FEDERAL DATABASES .....	3
2.1.2 STATE DATABASES.....	7
2.2 HISTORICAL RECORDS REVIEW .....	10
2.2.1 SANBORN FIRE INSURANCE MAPS.....	10
2.2.2 AERIAL PHOTOGRAPHS .....	11
2.2.3 CITY DIRECTORIES.....	12
2.3 PREVIOUS SITE INVESTIGATIONS/ ESAS.....	13
3.0 SITE INSPECTION .....	16
3.1 SITE OVERVIEW .....	16
3.2 ENVIRONMENTAL SETTING/ ADJACENT PROPERTIES.....	17
3.3 UTILITY SERVICES.....	18
3.4 UNDERGROUND STORAGE TANKS (USTs).....	19
3.5 ABOVEGROUND STORAGE TANKS (ASTs) .....	19
3.6 RAW MATERIAL AND CHEMICAL USE AND STORAGE.....	20
3.7 SOLID WASTE .....	22
3.8 HAZARDOUS WASTE.....	23
3.9 WASTEWATER.....	24
3.10 STORMWATER.....	24
3.11 AIR EMISSIONS.....	25
3.12 ASBESTOS CONTAINING MATERIALS (ACM).....	25
3.13 POLYCHLORINATED BIPHENYLS (PCBs) .....	26
3.14 IONIZING RADIATION .....	26
3.15 SPILLS/RELEASES .....	27
3.16 CERCLA LIABILITY POTENTIAL .....	27
3.17 LEAD-BASED PAINT (LBP) .....	28
4.0 SUMMARY OF IDENTIFIED ENVIRONMENTAL ISSUES.....	29
4.1 FINDINGS.....	29
4.1.1 POTENTIAL HISTORIC RECOGNIZED ENVIRONMENTAL CONDITIONS .....	29
4.1.2 POTENTIAL CURRENT RECOGNIZED ENVIRONMENTAL CONDITIONS .....	29
4.2 CONCLUSIONS.....	30

PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST

LIST OF FIGURES  
(Following Text)

FIGURE 1	SITE LOCATION MAP
FIGURE 2	SITE PLAN

LIST OF TABLES  
(Following Text)

TABLE 1	BULK TANK INFORMATION
TABLE 2	HAZARDOUS WASTE SHIPMENTS 2003/2004
TABLE 3	WASTEWATER TREATMENT RESULTS (2004)
TABLE 4	AIR POLLUTION CONTROL PERMITS TO OPERATE

LIST OF APPENDICES

APPENDIX A	ASSESSOR QUALIFICATIONS
APPENDIX B	SUMMARY OF DATABASE SEARCH
APPENDIX C	HISTORIC AERIAL PHOTOGRAPHS
APPENDIX D	CITY DIRECTORY SEARCH RESULTS
APPENDIX E	PHOTOGRAPHIC LOG
APPENDIX F	CHEMICAL INVENTORY

## EXECUTIVE SUMMARY

Conestoga-Rovers & Associates (CRA) was retained by Delphi Corporation (Delphi) to complete a Phase I Environmental Site Assessment (ESA) of the Delphi Corporation Anaheim Battery Operations facility located at 1201 N. Magnolia Avenue in Anaheim, Orange County, California (Site or Property). The purpose of the Phase I ESA was to identify recognized environmental conditions (RECs), as defined by ASTM Standard E1527-00, at the Site. This ESA was conducted to assist Delphi in evaluating business environmental risk, as defined in ASTM E1527-00, for the Site. The Phase I ESA Site inspection was conducted by CRA on October 5 and 6, 2004.

The Site consists of a 26-acre parcel of land occupied by an active, one story manufacturing building with a total of 285,568 square feet of floor space, three warehouse buildings and various ancillary buildings. Delphi currently occupies the Site for the manufacture of lead acid storage batteries for the automotive industry.

Based on the Phase I ESA including the Site inspection, database search, historic records reviewed, information provided by Site personnel, and interviews, the following potential RECs were identified at the Site.

## POTENTIAL HISTORIC RECOGNIZED ENVIRONMENTAL CONDITIONS

Potential historic RECs identified at the Site were as follows:

- i) Leaking Underground Storage Tanks (LUSTs): According to Site reports reviewed, six USTs were removed from two areas at the Site in 1986. Neither the removal report nor any documentation regarding the regulatory status of the UST areas could be located at the Site. Additionally, indications are that monitoring wells were associated with the UST removal and no documentation regarding the status of these wells was available. The database information obtained from EDR indicates that the USTs are listed as closed; however, no information was available for CRA to review
- ii) Former Lead Reclamation Area: Up until the mid-1980's, scrap lead was reclaimed in the area now occupied by the Site's hazardous waste storage area. The floor in this area is concrete and shows signs of wear and cracking.

**POTENTIAL CURRENT RECOGNIZED ENVIRONMENTAL CONDITIONS**

The following potential current RECs were identified at the Site:

- i) **Above Ground Storage Tanks (ASTs)**: All acid ASTs are situated on top of acid resistant bricks that sit on top of the concrete slab. While secondary containment for all spilled liquids is present, there was a significant amount of liquid pooled around the base of the tanks. Based on the condition of the bricks, the potential for a release from this area is high. Potential impact to underlying soils could not be determined.
- ii) **Raw Material and Chemical Use and Storage**: At several locations within the production area, acid is drained and recharged in the individual batteries. This is done in areas where the floor is covered with acid resistant bricks. Based on observations during the Site inspection, the integrity of these bricks is questionable, with an associated risk for release. Potential impact to underlying soils could not be determined.
- iii) **Battery Charging Tables**: In the main production building there are battery charging tables with underflow ventilation. Around each of these tables, concrete cracks were observed along with sulfuric acid residue buildup. The potential impact from a release from this area to underlying soils could not be determined.
- iv) **Oil Processing Area**: Used oils are transferred from the production area to the used oil processing building via transport carts. It is then dumped into the used oil handling sump from which it is pumped through a particle separator and then to the holding tank. The integrity of the sump could not be determined during the Site inspection. Potential impact to underlying soils could not be determined.
- v) **Solid Wastes**: According to Site personnel and as observed by CRA, dry sweeper material from the cleaning of the outside pavement areas has been dumped in the northwest area of the Site; adjacent to the gravel former truck parking area. This activity no longer occurs, and the majority of the material has been removed and properly disposed of off Site. However, it is very likely that these sweepings contained minor amounts of lead and may have impacted Site soils.
- vi) **Spills/Releases of Lead Dust**: Releases of lead oxide may have occurred in at the Site. The extent to which these releases have impacted Site soil and groundwater quality is not known. There are no known or documented releases of lead oxide dust.

**RECOGNIZED ENVIRONMENTAL CONDITIONS**

CRA has performed a Phase I Environmental Site Assessment of the industrial Property and buildings located at 1201 N. Magnolia Avenue in Anaheim, California in conformance with the scope and limitations of ASTM Practice E1527-00. Any exceptions to or deletions from this practice are described in Section 1.0 of this report. This assessment has identified the following recognized environmental conditions at this Site:

- Leaking USTs;
- Former Lead Reclamation Area;
- ASTs;
- Raw Material and Chemical Use and Storage;
- Battery Charging Tables;
- Used Oil Processing Area;
- Solid Wastes; and
- Spills/Releases of Lead Dust.

## 1.0 INTRODUCTION

Conestoga-Rovers & Associates (CRA) was retained by Delphi Corporation (Delphi) to complete a Phase I Environmental Site Assessment (ESA) of the Delphi Corporation, Anaheim Battery Operations facility located at 1201 N. Magnolia Avenue in Anaheim, Orange County, California (Property or Site). The purpose of the Phase I ESA was to identify recognized environmental conditions (RECs), as defined by ASTM Standard E1527-00, at the Site. This ESA was conducted to assist Delphi in evaluating business environmental risk, as defined in ASTM E1527-00, for the Site. The Phase I ESA Site inspection was conducted by CRA on October 5 and 6, 2004. A Site location map is provided on Figure 1. A Site plan is provided on Figure 2.

The Site consists of a 26-acre parcel of land occupied by an active, one story manufacturing building with a total of 285,568 square feet of floor space, three warehouse buildings and various ancillary buildings. Delphi currently occupies the Site for the manufacture of lead acid storage batteries for the automotive industry.

The Phase I ESA was conducted in general accordance with ASTM Standard E1527-00 for conducting environmental assessments. The assessment included an environmental database search, historical records review, a Site inspection of accessible areas, a review of relevant Site records made available to CRA, and interviews with individuals associated with the Site. No exceptions to ASTM E1527-00 were taken during this Phase I ESA. This Phase I ESA was prepared by Mr. Erik Friedrich and Mr. Brian Boevers of CRA. Copies of curriculum vitae outlining their qualifications are contained in Appendix A.

The following tasks were conducted during the assessment:

- review of Federal and State environmental databases and historical records (e.g., fire insurance maps, topographic maps, etc.);
- review of Property title information;
- review of aerial photographs of the Site;
- review of past and current Property use and adjacent property occupancy;
- inspection of the facilities, equipment, utility services, operations, and associated Site records;
- observations of conditions that represented potential environmental concerns;
- review of chemical use and storage and spill/release incidents;

**PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST**

- review of the results of prior inspections conducted at the Site;
- review of waste handling, accumulation, storage, and disposal practices;
- review of air emissions and wastewater discharges;
- review of equipment that potentially contain polychlorinated biphenyls (PCBs);
- observation of potential asbestos-containing materials and lead-based paint;
- review of aboveground and underground storage tank records;
- review of environmental related permits and their present compliance status; and
- inquiries with regulatory agencies and discussions with persons knowledgeable of the Site and Site operations.

CRA relied on information received from regulatory agencies and Site personnel as accurate unless contradicted by written documentation or field observations.

The following report summarizes the information gathered by CRA during the Phase I ESA, including any recognized environmental conditions, as defined in ASTM Standard E1527-00, and substantive environmental compliance issues at the Site.

The Phase I ESA has been prepared for the use of Delphi and may not be relied upon by any other party without written consent from CRA.

**2.0 ENVIRONMENTAL DATABASES SEARCH AND  
HISTORICAL RECORDS SEARCH**

**2.1 ENVIRONMENTAL DATABASES SEARCH**

CRA contracted Environmental Data Resources, Inc. (EDR) to conduct a search of federal and state environmental databases. Based on the address of the Site, the database searches were completed to assist in the identification of conditions at the Site and within a radius distance specified in ASTM Standard E1527-00. A copy of the database search is included as Appendix B. The following databases were searched with the findings as follows:

**2.1.1 FEDERAL DATABASES**

1. National Priority List (NPL) - The NPL is a United States Environmental Protection Agency (USEPA) listing of the nation's worst uncontrolled or abandoned hazardous waste sites. NPL Sites are targeted for possible long-term remedial action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980. In addition, the NPL Report includes information concerning cleanup agreements between the USEPA and potentially responsible parties, any liens filed against contaminated properties, as well as the past and current USEPA budget expenditures tracked within the Superfund Consolidated Accomplishments Plan (SCAP).

**FINDING:** According to the databases searched, the Site was not on the NPL. No sites within a one-mile radius of the Site were on the NPL.

2. Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) - The CERCLIS List contains data on potentially hazardous waste sites that may have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to be or on the NPL and sites which are in the screening and assessment phase for possible inclusion on the NPL.

**FINDING:** According to the databases searched, the Site was not on the CERCLIS List. No sites within a half-mile radius of the Site were on the CERCLIS List.

**PRIVILEGED AND CONFIDENTIAL**  
**PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST**

3. No Further Remedial Action Planned Sites Report (NFRAP) - As of February 1995, CERCLIS sites designated "No Further Remedial Action Planned" have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund Action or NPL consideration. USEPA has removed approximately 25,000 CERCLIS sites to lift the unintended barriers to the redevelopment of these properties and has archived them as historical records so USEPA does not needlessly repeat the investigations in the future. This policy change is part of the USEPA's Brownfields Redevelopment Program to help cities, states, private investors and affected citizens to promote economic redevelopment of unproductive urban sites.

**FINDING:** According to the databases searched, the Site was listed in the NFRAP Sites Report (see Section 3.8). No sites within a quarter-mile radius of the Site were listed in the NFRAP Sites Report.

One site was listed in the NFRAP Sites Report, but could not be located with respect to the Site due to incomplete address information, this being Hooker Chemical & Plastics Corporation located at 5460 Knott Avenue.

4. Resource Conservation and Recovery Information System (RCRIS) - Non-Corrective Action Treatment, Storage and Disposal (TSD) Facilities Report - The RCRIS-TSD Report contains information regarding those facilities that either treat, store or dispose of USEPA-regulated hazardous waste. The following information also is included in the RCRIS-TS Report: information regarding the status of facilities tracked by the Resource Conservation and Recovery Act (RCRA) Administrative Action Tracking System (RAATS); inspections and evaluations conducted by Federal and State Agencies; all reported facility violations, the environmental statutes violated and any proposed and actual penalties; and a complete listing of USEPA-regulated hazardous wastes which are generated or stored on site.

**FINDING:** According to the databases searched, the Site was listed in the RCRIS-TSD Report (see Section 3.8). No sites within a one-mile radius of the Site were listed in the RCRIS-TSD Report.

One site was listed in the RCRIS-TSD Report, but could not be located with respect to the Site due to incomplete address information, this being Hooker Chemical & Plastics Corporation located at 5460 Knott Avenue.

PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST

5. Resource Conservation and Recovery Act (RCRA) - Corrective Action (CORRACTS) Report - The CORRACTS Report contains information pertaining to hazardous waste treatment, storage and disposal facilities (RCRA TSDs) which have conducted or are currently conducting corrective actions as regulated by the Resource Conservation and Recovery Act. The following information also is included in the CORRACTS Report: information regarding the status of facilities tracked by the RAATS; inspections and evaluations conducted by Federal and State Agencies; all reported facility violations, the environmental statutes violated and any proposed and actual penalties; information pertaining to corrective actions undertaken by the facility or the USEPA; and a complete listing of USEPA-regulated hazardous wastes which are generated or stored on site.

**FINDING:** According to the databases searched, the Site was listed in the CORRACTS Report (see Section 3.8). No sites within a one-mile radius of the Site were listed in the CORRACTS Report.

One site was listed in the CORRACTS Report, but could not be located with respect to the Site due to incomplete address information, this being Hooker Chemical & Plastics Corporation located at 5460 Knott Avenue.

6. Resource Conservation and Recovery Information System - Large Quantity Generators (RCRIS-LQG) Report - The RCRIS-LQG Report contains information regarding facilities that either generate more than 1,000 kilograms (kg) of USEPA-regulated hazardous waste per month or meet other applicable requirements of RCRA. The following information also is included in the RCRIS-LQG Report: information regarding the status of facilities tracked by the RAATS; inspections and evaluations conducted by Federal and State Agencies; all reported facility violations, the environmental statutes violated and any proposed and actual penalties; information pertaining to corrective actions undertaken by the facility or the USEPA; and a complete listing of USEPA-regulated hazardous wastes which are generated or stored on site.

**FINDING:** According to the databases searched, the Site was listed in the RCRIS-LQG Report (see Section 3.8). No adjacent sites were listed in the RCRIS-LQG Report. The following sites within a quarter-mile radius of the Site were listed in the RCRIS-LQG Report:

<u>Facility</u>	<u>Address</u>
Fuji Anaheim Color Lab Inc.	2665 Woodland Drive
Century Laminators	1182 Knollwood Circle
Micel Inc.	1240 N. Knollwood Circle

PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST

Century Laminators Inc.

1225 N. Knollwood Circle

7. Resource Conservation and Recovery Information System - Small Quantity Generators (RCRIS-SQG) Report - The RCRIS-SQG Report contains information regarding facilities that either generate between 100 kg and 1,000 kg of USEPA-regulated hazardous waste per month or meet other applicable requirements of RCRA. The following information also is included in the RCRIS-SQG Report: information regarding the status of facilities tracked by the RAATS; inspections and evaluations conducted by Federal and State Agencies; all reported facility violations, the environmental statutes violated and any proposed and actual penalties; information pertaining to corrective actions undertaken by the facility or the USEPA; and a complete listing of USEPA-regulated hazardous wastes which are generated or stored on site.

**FINDING:** According to the databases searched, the Site was not listed in the RCRIS-SQG Report. One adjacent site was listed in the RCRIS-SQG Report, this being FHP Anaheim Commercial Center located at 1236 N. Magnolia Avenue. The following additional sites within a quarter-mile radius of the Site were listed in the RCRIS-SQG Report:

<u>Facility</u>	<u>Address</u>
S and S Metals Inc.	2607 W. Woodland Drive
FHP Anaheim Senior Center	1200 N. Magnolia
Harvey Hubbell, Inc.	1212 N. Hubbell Way
Milwaukee Electric Tool	1130 N. Magnolia
Star Laminators	2665 W. Woodland Drive
Wesval Inc.	2545 W. Via Palma
Water & Energy Systems Technology	2516 Woodland Drive
Shell Service Station	1101 N. Magnolia
Portable X-Ray Labs Inc.	1151 Knollwood Circle
Optima Assett Management	1161 Knollwood Circle
Ellsworth Truck	1167 Knollwood
L&S Machine Enterprises	1190 Knollwood Circle
IPC Cal Flex Inc.	1255 N. Knollwood Circle
Aggressive Engineering Corp.	1235 N. Knollwood Circle

The following sites were listed in the RCRIS-SQG Report, but could not be located with respect to the Site due to incomplete address information:

PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST

<u>Facility</u>	<u>Address</u>
General Telephone of Ca.	2311 E. Anaheim Road
Hooker Chemical & Plastics Corp.	5460 Knott Avenue.

8. Emergency Response Notification System (ERNS) - ERNS records and stores information on reported releases of oil and hazardous substances.

**FINDING:** According to the databases searched, the Site was not listed in the ERNS.

9. Toxic Chemical Release Inventory System (TRIS) - The TRIS Database identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

**FINDING:** According to the databases searched, the Site was listed in the TRIS Database. No sites within a half-mile radius of the Site were listed in the TRIS Database.

#### 2.1.2 STATE DATABASES

1. California Underground Storage Tank (UST) Database - The California UST Database contains a list of active UST facilities gathered from the local regulatory agencies.

**FINDING:** According to the databases searched, the Site was listed in the California UST Database (see Section 2.4). One adjacent site was listed in the California UST Database, this being Talbert Medical Group Anaheim located at 1236 N. Magnolia Avenue. The following additional sites within a quarter-mile radius of the Site were listed in the California UST Database:

<u>Facility</u>	<u>Address</u>
Hubbell Lighting Division	1212 N. Hubbell Way
Metro Media Paging Service	1125 N. Magnolia
Good Guys Lube N Tune	2604 W. La Palma Avenue
Target Station 88	2604 W. La Palma Avenue
Arco Master Auto Repair	2604 W. La Palma Avenue
Chico Petroleum #1	1013 W. 1 <sup>st</sup> Street
Jack N The Box Restaurant #35	2508 W. Woodland Drive

**PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST**

Century Laminators, Inc.

1225 N. Knollwood Circle

Number of Tanks and Status information was not provided in the EDR database.

The following sites were listed in the California UST Database, but could not be located with respect to the Site due to incomplete address information:

<u>Facility</u>	<u>Address</u>
Arco #203	1700 W. La Palma Avenue
Anaheim 76 #254705	2585 W. La Palma Avenue
ANHMCA1W-ANA POP	2461 W. La Palma Avenue
Chevron #93558	2175 W. La Palma Avenue
S&R Industrial Sheet Metal	2535 W. La Palma Avenue
Unocal #4705	2585 W. La Palma Avenue
Ed's Chevron #9-3558	2175 W. La Palma Avenue

2. California Historical UST Database - The California Historical UST Database is a historical listing of underground storage tanks.

**FINDING:** According to the databases searched, the Site was listed in the California Historical UST Database (see Section 2.4). No adjacent sites were listed in the California Historical UST Database. The following sites within a quarter-mile radius of the Site were listed in the California Historical UST Database:

<u>Facility</u>	<u>Address</u>
Water & Energy Systems Technology	2516 Woodland Drive
Union Oil Service Station	2585 W. La Palma Avenue
Station #4705	2585 W. La Palma Avenue
Station 088	2604 W. La Palma Avenue
CW Poss., Inc.	2508 W. Woodland Drive
Aggressive Engineering Corp.	1235 N. Knollwood Circle
Century Laminators Inc.	1225 N. Knollwood Circle

One site was listed in the California Historical UST Database, but could not be located with respect to the Site due to incomplete address information, this being Chevron #93558 located at 2175 W. La Palma Avenue.

PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST

3. California Facility Inventory Database (FID) UST Database - The California FID UST Database contains a historical listing of active and inactive underground storage tank locations from the State Water Resource Control Board.

**FINDING:** According to the databases searched, the Site was listed in the California FID UST Database (see Section 3.4). No adjacent sites were listed in the California FID UST Database. The following sites within a quarter-mile radius of the Site were listed in the California FID UST Database:

<u>Facility</u>	<u>Address</u>
Hubbell Lighting Division	1212 N. Hubbell Way
Unocal #4705	2585 La Palma Avenue
Arco/Fast Fuel SS #88	2604 W. La Palma Avenue
CW Poss., Inc.	2508 W. Woodland Drive
Aggressive Engineering Corp.	1235 N. Knollwood Circle
Century Laminators Inc.	1225 N. Knollwood Circle

4. Leaking Underground Storage Tank (LUST) Report - The LUST Report contains an inventory of reported leaking underground storage tank incidents.

**FINDING:** According to the databases searched, the Site was listed in the LUST Report and was reported as having a closed status. One adjacent site was listed in the LUST Report, this being FHP Health Plan located at 1236 N. Magnolia Avenue, which was reported as having a closed status. The following additional sites within a half-mile radius of the Site were listed in the LUST Report:

<u>Facility</u>	<u>Address</u>	<u>Status</u>
Tosco - 76 Station #4705	2585 La Palma Avenue	Closed
Arco/Fast Fuel SS #88	2604 W. La Palma Avenue	Open
Portable X-Ray Labs Inc.	1151 Knollwood Circle	Closed

One site was listed in the LUST Report, but could not be located with respect to the Site due to incomplete address information, this being Former Anaheim Car Wash located at 900 Lincoln Avenue.

5. Solid Waste Facility List - The Solid Waste Facility List contains an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

**FINDING:** According to the databases searched, the Site was not on the Solid Waste Facility List. No sites within a half-mile radius of the Site were on the Solid Waste Facility List.

The following sites were listed on the Solid Waste Facility List, but could not be located with respect to the Site due to incomplete address information:

<u>Facility</u>	<u>Address</u>
Disposal Waste System/Kraft	2680 S. Garnsey
Anaheim-Olive Blvd. Dump	15505 Lincoln @ Glassel
Corona Dump	Not Reported
Cosby Oil / 5 Points Use	Not Reported

6. Cal-Sites Database – State hazardous waste site records are the states' equivalent to CERCLIS. Cal-Sites (AWP) identifies known hazardous substance sites targeted for cleanup. The Cal-Sites (ASPIS) database contains potential or confirmed hazardous substance release properties. These sites may or may not already be listed on the federal CERCLIS List. Priority sites planned for cleanup using state funds are identified along with sites where cleanup will be paid for by the potentially responsible parties.

**FINDING:** According to the databases searched, the Site was not listed in the Cal-Sites Database. No sites within a one-mile radius of the Site was listed in the Cal-Sites Database.

7. Annual Workplan Sites (AWP) – California DTSC's Annual Workplan (AWP) identifies known hazardous substance sites targeted for cleanup. The AWP Database is the states' equivalent to the Federal NPL.

**FINDING:** According to the databases searched, the Site was not listed in the AWP Database. No sites within a one-mile radius of the Site was listed in the AWP Database.

## 2.2 HISTORICAL RECORDS REVIEW

### 2.2.1 SANBORN FIRE INSURANCE MAPS

Sanborn Fire Insurance Maps assist in the identification of historic land use and commonly indicate the existence and location of aboveground and underground storage tanks, structures, improvements and facility operations.

No Sanborn Maps were reported to be available for the Site in the EDR Historic Map Collection.

### 2.2.2 AERIAL PHOTOGRAPHS

Aerial photographs assist in the identification of Site features and outdoor activities of potential environmental concern. CRA contracted EDR to obtain aerial photographs of the Site and surrounding lands. Photographs for the years 1938, 1947, 1954, 1968, 1977, 1990, 1994, and 2002 were obtained.

- 1938 (scale 1" = 555'): The 1938 aerial photograph indicates that the Site and surrounding properties were used for agricultural purposes at that time. The surrounding areas appear to be orchards, while the subject Site appears to be used for row crop production. There is a building that may be a rural residence in the northeast portion of the Site along Magnolia Avenue.
- 1947 (scale 1" = 666'): The 1947 aerial photograph indicates that the Site and surrounding properties continued to be used for agricultural purposes at that time. The Site and surrounding areas appear virtually unchanged from those conditions observed in the 1938 aerial photograph.
- 1954 (scale 1" = 833'): The 1954 aerial photograph shows that the main production building and associated parking lot had been constructed. The remaining surrounding areas appear unchanged with the exception of the area to the far southeast of the Site, which has been developed as residential dwellings. No other significant changes have occurred in the surrounding areas.
- 1968 (scale 1" = 480'): The 1968 aerial photograph shows the Site in a similar condition to that depicted in the 1954 aerial photograph, with the exception of the newly constructed baseball fields in the northern portion of the Site and an add-on portion to the main process building in the southwestern corner. Additionally, the western portion of the Site appears to be used for outside storage. Areas adjacent to the Site appear to be used for agricultural crop production, but areas furthest from the Site on all sides have been partially or completely developed. To the far west, south, and northeast, this development appears to be residential, while to the east, it appears to be commercial. To the north, the Interstate Freeway, I-5, has been widened and improved.
- 1977 (scale 1" = 666'): The 1977 aerial photograph depicts the Site in a condition very similar to that of the 1968 aerial photograph. The most notable changes in the aerial photograph were the surrounding areas. The adjacent areas to all sides of the Site have been developed as commercial developments. Numerous commercial

type buildings can be observed to the west, south, and east. In regards to the Site, there is a newly constructed building to the southwest (Warehouse #2) and there are visible areas of what appears to be stained or darkened soils on the west side of the Site. There appears to be some earthwork activity of unknown nature at the far northwest corner of the Site.

- 1990 (scale 1" = 666'): The 1990 aerial photograph of the Site depicts new Site structures to the south and west. These structures are the new charge room, wastewater treatment units, and Warehouse #3. To the northwest, the stormwater retention area appears to have been installed. The majority of the soil staining is no longer visible with the exception of a small area adjacent to the northwest corner of the production building. Additional development has occurred to the northeast, west, south and east of the Site.
- 1994 (scale 1" = 666'): In the 1994 aerial photograph, the Site and the surrounding areas appear relatively unchanged from the conditions observed in the 1990 aerial photograph.
- 2002 (scale 1" = 666'): In the 2002 aerial photograph, the Site and the surrounding areas appear relatively unchanged from the conditions observed in the two previous aerial photographs.

Copies of the aerial photographs are included in Appendix C.

### 2.2.3 CITY DIRECTORIES

CRA contracted EDR to conduct a search of city directories. Based on the address of the Site, the city directories search was completed to assist in the identification of historical occupants of the Site and adjacent properties. A copy of the city directories search results is included as Appendix D.

Business directories including city, cross-reference and telephone directories were reviewed, if available, at approximately five-year intervals from the earliest available directory to the present. Directories were available for the years spanning 1920 through 2002. The search indicated that there were no listings for the Site from 1920 through 1965. The Site was first listed in 1970 as the Delco Battery Plant, General Motors Corporation. In 1975, the listing changed to Delco Remy, Division of General Motors Corporation. It was listed as Delco Remy until 1995 after which the address was not listed in the Research Source.

## 2.3 PREVIOUS SITE INVESTIGATIONS/ESAS

According to Site personnel and Site records reviewed, various environmental investigations and assessments have been conducted at the Site. The following is a list and a brief summary of the reports reviewed:

- April 2003: Environmental Liability Assessment, prepared by Harding ESE, a Mactec Company.

An internal liability assessment of the Site was conducted to quantify significant recognized liabilities related to environmental remediation at the Site. The assessment did not identify any Type C or Type B environmental liabilities and identified only one Type A liability. This liability was identified as follows:

- Soil Removal in the Area of the Storm Water Retention Basin - Lack of confirmatory samples for a 1996 soil removal program.

In addition to the Type A liability identified, five potential areas of liability (PAOL) were dropped from further evaluation because these PAOLs did not meet the evaluation criteria for Types A, B or C as they were not probable. These PAOLs were:

- Acid mixing room;
- Unknown piping labeled "Flammable Gas";
- Used oil and new oil storage areas;
- Hazardous waste storage areas; and
- Asbestos in building materials.

These potential areas of concern are discussed further in other sections of this report.

- January 1999: Draft Soil Remediation Closure Report, Northwest Field prepared by ENV America Incorporated.

Between August 25 and 31, 1998, soils were excavated from the northwest field. The reason for the excavation was the presence of lead in the shallow soils. Lead had been detected at concentrations ranging from 38 mg/kg to 9,850 mg/kg. The soil cleanup goal for this activity was 1,000 mg/kg. For each location excavated, confirmation soil samples were collected at depth to confirm the complete removal of all lead contaminated soils above the remedial criteria. A total of 1,108 tons of

**PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST**

soil were excavated and shipped to the Laidlaw Environmental Services/Safety-Kleen, Lone Mountain Facility in Waynoka, Oklahoma.

- Between 1988 and 1991, various workplans by Dames & Moore for the remediation of the northwest field were reviewed. These included the following:
  - August 1991: Workplan for Remedial Action, Delco Remy Site, Northwest Field Area;
  - March 1991: Workplan for Remedial Action, Delco Remy Site, Northwest Field Area;
  - October 1989: Revised Report, Evaluation of Remedial Action Alternatives and Selection of an Appropriate Alternative, Delco Remy Site, Northwest Field Area; and
  - November 1988: Report, Site Assessment and Remedial Action Plan, Delco Remy Facility, Northwest Field and Storm Drain Ditch.
- August 1989: Report, Further Investigation of Groundwater Conditions prepared by Dames & Moore.

This report documents further groundwater investigation activities conducted to determine the cause of discoloration of groundwater samples collected from monitoring well MW-1 at the Site. This was pursuant to a request made by the Regional Water Quality Control Board (RWQCB), Santa Ana Region dated May 15, 1989. In this report it is documented that six underground diesel fuel and used oil tanks were removed from two tank areas of the Site. Tank area #1 was located adjacent to the northwest corner of the production building while the second tank area (#2) was located adjacent to the central portion of the west side of the building. No contamination was detected in soil samples analyzed from tank area #1 (Dames & Moore, 1986). Soils excavated from tank area #2, where waste oil had been stored, were found to be impacted with total petroleum hydrocarbons (TPH). The impacted soils in tank area #2 were excavated and hauled off Site.

In July 1986, monitoring well MW-1 was installed near tank area #2. This well was installed in a shallow groundwater zone encountered at a depth of approximately 30 feet below the ground surface (bgs). No detectable TPH were found in the groundwater samples but pH values were reported as 9.0 and 9.6. Additionally, the water samples exhibited a cloudy brown color.

PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST

In July 1988, two additional monitoring wells (MW-2 and MW-3) were installed in areas several hundred feet to the northeast and southeast of MW-1. No detectable TPH concentrations were detected and the pH values ranged from 7.36 to 7.42.

To determine why the groundwater had a brownish color, groundwater samples were again collected from all three wells and analyzed for various parameters. It was discovered that the discoloration was due to dissolved natural organic substances called humic acids present in the aquifer materials in the soil near MW-1.

- January 1989: Report, Soil Hydrocarbon Investigation, South end of Former Drainage Ditch, prepared by Dames & Moore.

This report presents the results of a soil sampling and analysis program for the southern end of the former unlined storm drainage ditch located in the northwest section of the Site. This ditch was used to collect Site surface drainage resulting from precipitation. The unlined drainage ditch discharged to the Magnolia storm drain channel under a NPDES permit. In September 1988, during the course of lining the ditch, Delco Remy excavated a few feet of soil containing elevated lead concentrations. During the course of soil sampling conducted prior to lining the ditch, hydrocarbon odors and discoloration were observed. Soil samples were collected and analyzed. No benzene, toluene, ethylbenzene, and xylene (BTEX) or diesel fuel range TPH were detected. However, total recoverable petroleum hydrocarbons (TRPH) concentrations ranging from 1,300 mg/kg to 2,600 mg/kg were detected. It was concluded that the soils were impacted due to a past minor hydrocarbon spill and that deeper soils were not impacted (>7 feet bgs). It was estimated that the soils impacted consisted of 2 to 7 cubic yards.

There are other Site investigation reports as referenced in the reports reviewed, but they were not available for review at the Site.

### 3.0 SITE INSPECTION

On October 5 and 6, 2004, Mr. Erik Friedrich of CRA completed a Site inspection of the Delphi Site located at 1201 N. Magnolia Avenue in Anaheim, California. This included an inspection of the Site and Site structures, review of relevant Site records made available to CRA, visual observations of adjacent properties as viewed from the Site and surrounding roadways, and interviews with individuals associated with the Site.

CRA was accompanied by Mr. Bill Vierra during the Site inspection. Mr. Vierra is the Site's environmental facility engineer and has been associated with the Site for almost three years. Site personnel provided information regarding the current and historic use of the Site.

Representative photographs of the Site are provided as Appendix E.

### 3.1 SITE OVERVIEW

The Site consists of approximately 26 acres of land located in a commercial/industrial section of the City of Anaheim, Orange County, California. A Site plan is shown on Figure 2. The original production building was constructed in 1953 by Delco Remy, Division of General Motors for the production of automobile batteries. Major construction activities have occurred in 1963, 1974, and 1977 for a warehouse, production line buildings, and an unknown project. The production area floor space is 285,568 square feet.

The main production building, which was built in 1953, is principally brick and block construction on a slab-on-grade. The office area, which comprises a small portion of the eastern side of the facility, consists of vinyl tiled floors, suspended ceilings with fluorescent lights, and wood paneled wall dividers. The ceiling of the main production area is open with skylights and metal support beams.

The ancillary buildings are either sheet metal or masonry block walls with wood and metal roof support structures. They also are slab-on-grade construction.

Also associated with the Site are the process water treatment basin and system, the stormwater retention basin, a rail line spur, facility landscaped areas, employee parking lots, driveways, and until recently, two baseball diamonds. These diamonds and associated land (approximately two acres) were sold to the City of Anaheim along with access easements. With the exception of the lawn and landscaped areas east of the

production area and the gravel covered former truck/van parking area, the entire Site is paved.

The Site manufactures lead/acid storage batteries, primarily for the automotive industry. This includes melting and reforming lead by heat treating and cooling. The plant receives the lead from an outside source. The lead is melted and reformed into strips that are rolled into coils. The coils are heated and pressed into plates, which are covered with paste consisting of lead oxide, sulfuric acid, and water. The plates are then heated in a humidity oven or steam oven, grouped and wrapped in plastic, and placed into battery cases, which are also manufactured on Site. The batteries are then filled with acid, charged for 8 hours, emptied of initial acid, and refilled with fresh acid. The batteries are then sealed and stored on pallets for delivery to Delphi's clients.

Operations include plastic injection molding of battery cases and covers, lead oxide manufacturing, lead plate manufacturing, lead paste coating and curing, lead plate encapsulation, battery assembly with welded posts, heat sealing of batteries, acid mixing, and battery wet finishing and charging. Operations also included lead reclamation until the mid 1980s. Attendant support services include tool repair and manufacture, quality control, engineering, warehousing, maintenance and utility services, wastewater pretreatment, stormwater treatment, and employee services.

### 3.2 ENVIRONMENTAL SETTING/ADJACENT PROPERTIES

The Site is located in the City of Anaheim, Orange County, California in a commercial/industrial area in the center of a wider residential area. The Property is rectangular with frontage onto Magnolia Avenue. The surrounding area is used primarily for commercial and industrial use. The Site is relatively flat and is bordered by the following properties:

<u>North:</u>	By Interstate I-5 and Southern California Tow Equipment;
<u>East:</u>	Magnolia Avenue and further east by Wickes Furniture, American Cancer College, and Talbert Medical Group;
<u>South:</u>	ROP Career & Technical Institute and strip office buildings;
<u>West:</u>	CaliWest Car Wash Systems, a vacant office/commercial building, Ryan Herco Pumps, another vacant commercial building, and L&S Screw Machines.

Site personnel were not aware of any adverse environmental impact to the Site from the adjacent properties. No evidence of adverse impact to the Site from surrounding properties was observed by CRA during the Site inspection. One adjacent property was identified in the EDR database report, this being the property located at 1236 N. Magnolia Avenue. This property is listed as having occupants identified as follows:

- FHP Anaheim Commercial Center, and
- Talbert Medical Group

This property was listed in the RCRIS-SQG federal list and in the California UST database as well as the California LUST report. In the LUST report, the site is listed as having a closed status.

There are no surface water bodies or water courses located on Site or immediately adjacent to the Property. The nearest surface water body/water course is unknown.

The EDR database search did not provide any information regarding the Site soils. However, information from the Site reports reviewed indicates that the Site soils are alluvial deposits consisting of poorly consolidated to unconsolidated clay, silt, sand, and gravel of continental origins. Perched groundwater in the area is encountered at a depth of approximately 30 feet bgs with potable aquifers at a depth greater than 100 feet bgs. The groundwater flow direction is reported to be to the southwest.

### 3.3 UTILITY SERVICES

Potable water is provided to the Site by the City of Anaheim. According to Site personnel and based on observations made during the Site inspection, no water supply wells exist at the Site.

All sanitary wastewater and process wastewater are and have been discharged to the local municipal stormwater system after treatment since the Delphi facility was built in 1953. No evidence of a septic system was observed during the Site inspection or noted in the review of available information.

Electricity is provided to the Site by Anaheim Local Utility Service while natural gas is provided by Southern California Gas. The Site building space heating is provided by either localized gas fired heaters or by roof mounted HVAC units. Process heat is supplied by steam generated by one gas-fired boiler. There is a backup boiler that is currently unused. Electricity is supplied to the Site from five transformer substations;

two are located near the north central portion of the main building, two are south of the production building, while the last one is on the east side of the production building.

### 3.4 UNDERGROUND STORAGE TANKS (USTs)

According to Site personnel, there are no USTs that contain petroleum or hazardous substances located on the property. There were a number of such USTs in the past as discussed below. No evidence of any currently present USTs (e.g., vent or fill pipes) was observed by CRA during the Site inspection, with the exception of a fill pipe located on the northern portion of the property near the gasoline AST. This fill pipe was associated with the diesel UST discussed below.

While no documents regarding the closure of these six tanks could be located by Site personnel, other documents reviewed by CRA contained information stating that six diesel/used oil tanks were removed in 1986 from two areas at the Site. During the UST removals, TPH concentrations reportedly were detected only in the UST area #2 and the impacted soils were removed and three monitoring wells were installed. Confirmatory analytical results were not included in the documents reviewed by CRA. No TPH concentrations were detected in any of the groundwater samples analyzed from the monitoring wells after the soil removal.

The Site is listed in the California UST, the California Historical UST, the California FID UST and the California LUST information databases in Section 2.0. The Site is listed in the LUST database as having a closed status.

### 3.5 ABOVEGROUND STORAGE TANKS (ASTs)

The Site maintains various ASTs at the Site. Table 1 contains a listing of the tanks, their contents, volume and containment.

The following is a discussion of the primary above ground storage tanks located on the Site property:

- **Sulfuric Acid ASTs:** The 12 on-Site sulfuric acid tanks are located either outside the acid mixing room or inside the room adjacent to the wastewater treatment system in the southeastern portion of the Site. All of these tanks are fiberglass and sit on top of acid resistant brick on top of concrete. The condition of these acid resistant bricks varied from good to very poor. There is secondary containment for all of these

tanks. For the eight tanks inside, the secondary containment consists of a drain trench that flows to a collection sump. Acid and/or water collected in the sump is transferred to a mixing tank for reuse.

- **Sodium Hydroxide ASTs:** There is one AST that contains sodium hydroxide, which is located in the wastewater treatment portion of the south building. The tank is surrounded by a grated trench that is connected to a blind sump. The floor beyond the grated trench is concrete. No pipes enter the tank below the liquid level and exit the secondary containment structure (the room). No pipes penetrate the secondary containment that affect secondary containment. No signs of leakage were observed.
- **Oil Recovery System AST:** Hydraulic oil collected from the plastic injection molding machines is recovered through a used oil recovery system. This system consists of individual troughs around each machine to collect the oils. On a routine basis, the oils are removed via mobile units that vacuum the oils out. The units are then taken to the used oil recovery building located east of Warehouse #3. There, the oil is drained into a trough, siphoned through a particulate screener and pumped to the 5,000-gallon used oil storage tank located adjacent to the building. The tank is welded steel sitting on a concrete slab with concrete containment walls. The concrete appeared to be in good condition and no evidence of leaks was observed.
- **Gasoline AST:** A 217-gallon, self-contained (tank within a tank) AST is located northeast of the main building near the shipping docks. There were no signs of leakage from this tank.
- **Diesel Fuel AST:** This AST, which supplies the firewater pump, is filled no more than once every two years. The tank is located within the pumphouse and has secondary containment. The concrete appeared to be in good condition and no evidence of leaks was observed.

No evidence of abandoned on-Site ASTs was observed by CRA at the time of the Site inspection with the exception of a former propane tank pad in the Site's far northwest corner. The Site is not listed in any of the AST related databases discussed in Section 2.0.

### 3.6 RAW MATERIAL AND CHEMICAL USE AND STORAGE

The following materials are used in the production of lead/acid batteries at the facility:

PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST

- **Lead and lead dioxide used in the production of lead plates:** Lead is received in 2,000 pound ingots (hogs) and stored in the production area on pallets. Smaller 200 pound ingots (pigs) The majority of the lead is extruded into plates. The remainder is converted into lead oxide and is the major ingredient of the paste placed on the plates.
- **Sulfuric acid which acts as the electrolyte:** Sulfuric acid is stored in tanks, mixed in the acid house, and transported to and from the acid filling and acid draining areas through overhead pipes.
- **Polypropylene used to form the battery cases and covers;** Polypropylene is delivered by train cars to two silos on Site. This material is pneumatically transferred to the case and cover forming areas in the plant where it is melted and extruded to form cases and covers.
- **Polyethylene envelopes used to separate the oppositely charged plates:** Polyethylene film is received in roll form by truck, stored in the production area, and formed into envelopes for the plates that hold one of the charges within the battery.

Smaller quantities of the following materials are also used in battery production or found in the major raw materials:

- Hot melt;
- Paper (wood pulp);
- Antimony (in lead);
- Tin (in lead);
- Calcium (in lead);
- Lignosulfonic acid;
- Caustic soda;
- Silver; and
- Colloidal carbon.

The manufacturing floor occupies most of the main building. Included are the tool room, encapsulation operation, case and cover molding and assembly, lead plate manufacturing, battery assembly, battery wet finishing and charging, lead oxide manufacturing, and lead reclamation areas (now shut down). Secondary containment/diversion generally consists of the concrete floor, and some floors are also covered with acid resistant brick. The largest potential leak in the manufacturing area would occur at the battery acid filling area. The largest vessel in the area has a volume of 7,200 gallons.

Generally, the floor drains and trench drains are part of the process sewer system. In the wet finishing areas, the acid is collected in a separate trench system and is recycled. In

the case and cover molding areas, the used hydraulic oil is collected in a trench drain that surrounds each station. The oil is pumped out on a regular basis to the oil recovery system waste oil AST portion of that system.

Materials used in support operations include: hydraulic oil; propane; water and wastewater treatment chemicals, such as sodium hydroxide, coagulants, and biocides; gasoline; and maintenance-related chemicals. Oils and other chemicals are stored either at points of use or in the hallway near the boiler room.

Finished batteries, containing approximately one gallon of acid solution each, are stored in the warehouses prior to shipping. The concrete floor of each warehouse appears to provide adequate secondary containment.

The railroad line is used to deliver only non-hazardous material to the plant. Site personnel were unsure whether in the past, lead and sulfuric acid were delivered by rail. If they had been, spillage could have occurred along the railroad spurs.

According to Site personnel, no significant spills or releases of any of the chemicals used at the Site has occurred in the past. No significant staining or other visual evidence of releases was observed by CRA in the vicinity of the chemical storage areas.

### 3.7 SOLID WASTE

Waste materials generated at the facility are collected and placed into dumpsters or compactors for cardboard; aluminum cans, bottles and plastics; and general trash. Except for trash, all materials are recycled by various companies. General plant trash is transported and disposed by Anaheim Commercial Services for local landfill disposition.

According to Site personnel, there has not been any on-Site disposal of solid wastes. CRA did observe signs of solid waste disposal in the northwestern portion of the Site. This waste disposal consisted of outside pavement area sweepings, principally dust, which had been disposed of in various piles in the northwestern portion of the Site.

The industrial trash is disposed of by Safety Kleen of Utah, while the plastics and lead wastes are recycled by RSR Quemet Company. Cardboard is recycled by a local service. No other evidence of on-Site solid waste disposal was observed by CRA during the Site inspection.

### 3.8      HAZARDOUS WASTE

The Site is a large quantity generator of hazardous waste and has one storage area used to store hazardous wastes. This area is the former lead reclaim area that, although no longer used for reclaim operations, is still used to store lead scrap. In this area, the facility recontainerizes their hazardous waste and segregates the hazardous materials that are to be recycled. The Site's generator ID No. is CAD008323396. Table 2 contains a listing of the hazardous wastes generated and disposed of at the Site for 2003 - 2004.

The Site generates lead scrap, lead-contaminated plant cleanup material, PPE, corrosive waste, used hydraulic oil, lead-containing filterpress cake , sand filter waste, lead-contaminated equipment, and process wastewater.

All lead scrap, lead-contaminated cleanup material, and lead-contaminated equipment are stored in the hazardous waste storage. The lead-containing filterpress filtrate is stored in the wastewater treatment facility. The used hydraulic oil is stored in the used oil building. Cleaning solutions and sand in the sand filter are used until transported from the facility as waste. Process wastewater undergoes no storage, but is treated on Site as it is generated under a wastewater pretreatment permit.

All lead scrap from battery component manufacturing and the lead-containing filterpress cake are recycled by Quemetco in the City of Industry, California. All lead-bearing wastes generated through cleanup, sand filter replacement, and scrapping of equipment is sent to the Clean Harbor, Grassy Mountain Facility in Clive, Utah for disposal. DeMenno Kerdoon in Compton, California recycles the plant's used oils.

According to Site personnel, there has been no on-Site disposal of hazardous waste to the best of their knowledge. No evidence of on-Site disposal of hazardous waste was observed by CRA during the Site inspection. As mentioned in Section 3.7, floor sweepings in the northwest portion of the Site would be expected to contain lead and may be a hazardous waste. CRA was not aware of any sampling completed to determine if this may be a hazardous waste.

The site is listed in several of the Hazardous Waste databases searched. It is listed in the NFRAP Sites Report, the RCRA-TSD report, the CORRACTS report and the RCRIS-LQG report. According to Site personnel, the facility is not listed as a TSDF as they do not keep hazardous wastes on-Site longer than 90 days. It is not clear why the Site is listed in the NFRAP, RCRA-TSD, and CORRACTS reports. According to Delphi personnel,

the reason may be that the Site had an interim RCRA Part A permit in the 1980s that does not appear to have been closed out.

CRA reviewed the site Hazardous Waste Manifests for the past two years and found them to be complete with the return copies contained in the files.

### 3.9 WASTEWATER

Wastewater is collected by a process sewer in the main building. Most of the wastewater is carried by a system of overhead lines from sumps and pits to the processing tanks in the wastewater treatment plant. The in-ground process sewer is pumped to the wastewater treatment system. The capacity of the three-tiered system is 60,000 gallons. The underground sewer lines and sumps and pits have only received maintenance on an as-needed basis and have not been subjected to periodic inspection.

According to Site personnel, sanitary sewerage is discharged to the local municipality for treatment.

The wastewater treatment consists of three phases. The first, neutralization, is accomplished by addition of sodium hydroxide to adjust the pH. The second is the addition of chemical polymer to precipitate the lead. The third is the removal of the precipitated lead using a filterpress. The filter cake is sent to a recycler for processing. The liquid effluent is discharged to the city sewer for final treatment under an Industrial Wastewater Discharge Class I Permit, Permit No. 03-1-089 issued by the Orange County Sanitation District. CRA reviewed the wastewater treatment permit as well as the most recent analytical results. According to Site personnel, the facility has not exceeded the permit limitations in the past four years. The last notice of violation for the wastewater system was dated January 1, 2001. Table 3 provides the wastewater treatment flow and analytical data for the past year.

### 3.10 STORMWATER

Stormwater generated at the Site either infiltrates into the ground or is routed by overland flow through an oil/water separator to the on-Site 380,000-gallon stormwater retention basin and, after filtration, discharges to the municipal storm sewer. The oil/water separator is located in the northwest corner of the retention basin. On the basis of outdoor waste material storage practices as well as outdoor raw material loading practices, Delphi is required to maintain a general National Pollutant Discharge

Elimination System (NPDES) Permit (#CAS000001). A copy of the general stormwater permit as well as the most recent stormwater discharge analytical data were reviewed by CRA as was a recent (8/2002) RWQCB inspection report. The facility had corrected the deficiencies as noted by the RWQCB and is now in compliance. The last exceedance of the 0.050 mg/L RWQCB stormwater benchmark for lead was in January 2001.

### 3.11 AIR EMISSIONS

The Delphi facility has air pollution control permits for approximately 76 different sources of air contaminants (Table 4). Most of the exhaust of the entire building passes through baghouses with the exception of heat exhausters in the Barton Pod area, the warehouses, and the new cell area in the facility.

The principal emissions from the Delphi facility are lead and sulfuric acid. Delphi maintains three Site perimeter air samplers from which samples are collected every six days. These samplers have not recorded ambient air concentrations of lead in excess of the ambient air quality standard of 1.5 ug/m<sup>3</sup>.

In addition to the perimeter air sampling, Delphi conducts air emission calculations based on facility production, processes and materials used. This information is used to document permit compliance. CRA reviewed these data and the facility is in compliance with the permit requirements. All permits are current.

Site personnel interviewed during the course of the Site inspection were not aware of any adverse impacts to the Site related to the operation of air emission equipment by Delphi. No adverse impacts to the Property from air emission sources were observed by CRA during the Site inspection.

### 3.12 ASBESTOS CONTAINING MATERIALS (ACM)

The presence of ACM at the Site was investigated through discussions with facility personnel and visual observations made by CRA. No intrusive investigations were conducted to examine areas of concealed space and no samples were collected. Facility representatives were aware of ACM being present in the buildings, primarily in association with the boilers and associated steam lines. They were not aware of any ACM surveys that had been conducted at the Site. Facility representatives indicated that to their knowledge, only small amounts of asbestos have been removed from the Site.

This is documented by August 1998 and October 1989 reports, which document asbestos removal activities.

An ACM survey was not conducted as part of this ESA. Based on observations during the Site inspection and due to the age of the buildings, it is likely that ACM is present. Potential ACM observed by CRA was limited to ceiling tile and floor tile in office areas. For the production and warehouse areas, suspect ACM consisted of bricks, roof mastic, drywall joint compound, floor tiles, piping insulation, spray on fire proofing, furnace and boiler insulation, and other mastics. All materials were observed to be in good condition.

### 3.13 POLYCHLORINATED BIPHENYLS (PCBs)

Electrical service to the Site is provided by Anaheim Public Utility through two separate lines that feed 7 on-Site transformers. According to Site personnel, these transformers do not contain PCBs and a PCB survey of the facility had been conducted. Documentation of this was not available and the transformers were not labeled. No leaks from the transformers were observed. There is also an out-of-service electrical transformer stored outside the production area. The transformers are reportedly owned by Delphi.

According to Site personnel, no PCB-containing equipment has been or is currently being used, stored, or handled at the Site. At the time of the Site inspection, potential PCB-containing equipment observed by CRA included the electrical transformers. Site personnel were unable to provide documentation of the age of the transformers or analytical testing for PCBs in the dielectric fluid. Potential PCB equipment also included the ballasts in the fluorescent lighting and high intensity discharge fixtures in the buildings.

With the exception of the out-of-service transformer, the potential PCB-containing equipment observed by CRA was in operation and appeared to be in good working condition.

### 3.14 IONIZING RADIATION

According to Site personnel, the Site has not used any sources of ionizing radiation in plant operations. No labeled radiation sources were observed by CRA during the Site inspection. Site personnel were unaware of any radon gas testing having been

conducted at the Site. The USEPA has determined Orange County to be in a Level 3 Radon Zone, with indoor air concentrations of radon anticipated to be less than 2 pCi/L. The USEPA established action level for radon gas is 4 pCi/L. There are no basements or occupied below grade areas at the Site in which radon gas potentially could accumulate.

### 3.15      SPILLS/RELEASES

Available site personnel were not aware of any reportable spills or releases associated with Site operations. No evidence of significant spills/releases was observed by CRA at the time of the Site inspection. The concrete floor of the production area exhibited signs of cracking; however, the concrete floor was well maintained and is cleaned on a regular basis. According to facility personnel, only minor hydraulic oil releases and coolant water releases onto the concrete floor inside the building have occurred at the Site. This is consistent with observations made by CRA at the time of the Site inspection.

For the areas in which sulfuric acid is handled, the floor consisted of acid bricks over concrete. This included the acid tank farm area. The acid brick showed signs of wear and standing liquid was observed.

Facility personnel also reported that no recordable chemical or petroleum releases have occurred there. CRA reviewed a 1990 letter from the RWQC that indicated the elevated pH detected in the groundwater in the former monitoring well MW-1 was the result of a sodium hydroxide release at the Site. Also, the results of the databases search, NFRAP report, indicates that there had been remedial actions conducted at the Site; however specifics were not provided.

### 3.16      CERCLA LIABILITY POTENTIAL

The Site is not listed on the NPL or in the State Hazardous Waste Site Databases. According to Mr. Vierra, Delphi has never received notification from any government agency or third party of liability as a potentially responsible party for any hazardous waste treatment, storage, or disposal Site. Delphi has never defended any environmental-related claims or litigation asserted by any governmental agency or third party related to this Site, and no potential claims or litigation presently exist to the best knowledge of Mr. Vierra.

**3.17      LEAD-BASED PAINT (LBP)**

Based on the age of the facility, LBP may be present on the Site. A LBP survey was not conducted by CRA. Site personnel were not aware of the presence of LBP at the Site.

#### 4.0 SUMMARY OF IDENTIFIED ENVIRONMENTAL ISSUES

##### 4.1 FINDINGS

Based on the Phase I ESA including the Site inspection, database search, historic records reviewed, information provided by Site personnel, and interviews, the following findings were identified at the Site.

##### 4.1.1 POTENTIAL HISTORIC RECOGNIZED ENVIRONMENTAL CONDITIONS

Potential historic RECs identified at the Site were as follows:

- i) Leaking Underground Storage Tanks (LUSTs): According to Site reports reviewed, six USTs were removed from two areas at the Site in 1986. Neither the removal report nor any documentation regarding the regulatory status of the UST areas could be located at the Site. Additionally, indications are that monitoring wells were associated with the UST removal and no documentation regarding the status of these wells was available. The database information obtained from EDR indicates that the USTs are listed as closed; however, no information was available for CRA to review.
- ii) Former Lead Reclamation Area: Up until the mid-1980s, scrap lead was reclaimed in the area now occupied by the Site's hazardous waste storage area. The floor in this area is concrete and shows signs of wear and cracking.

##### 4.1.2 POTENTIAL CURRENT RECOGNIZED ENVIRONMENTAL CONDITIONS

The following potential current RECs were identified at the Site:

- i) Above Ground Storage Tanks (ASTs): All acid ASTs are situated on top of acid resistant bricks that sit on top of the concrete slab. While secondary containment for all spilled liquids is present, there was a significant amount of liquid pooled around the base of the tanks. Based on the condition of the bricks, the potential for a release from this area is high. Potential impact to underlying soils could not be determined.
- ii) Raw Material and Chemical Use and Storage: At several locations within the production area, acid is drained and recharged in the individual batteries. This

is done in areas where the floor is covered with acid resistant bricks. Based on observations during the Site inspection, the integrity of these bricks is questionable, with an associated risk for release. Potential impact to underlying soils could not be determined.

- iii) **Battery Charging Tables:** In the main production building there are battery charging tables with underflow ventilation. Around each of these tables, concrete cracks were observed along with sulfuric acid residue buildup. The potential impact from a release from this area to underlying soils could not be determined.
- iv) **Oil Processing Area:** Used oils are transferred from the production area to the used oil processing building via transport carts. They are then dumped into the used oil handling sump from which it is pumped through a particle separator and then to the holding tank. The integrity of the sump could not be determined during the Site inspection. Potential impact to underlying soils could not be determined.
- v) **Solid Wastes:** According to Site personnel and as observed by CRA, dry sweeper material from the cleaning of the outside pavement areas has been dumped in the northwest area of the Site; adjacent to the gravel former truck parking area. This activity no longer occurs, and the majority of the material has been removed and properly disposed of off Site. However, it is very likely that these sweepings contained minor amounts of lead and may have impacted Site soils.
- vi) **Spills/Releases of Lead Dust:** Releases of lead oxide may have occurred in the at the Site. The extent to which these releases have impacted Site soil and groundwater quality is not known. There are no known or documented releases of lead oxide dust.

## 4.2 CONCLUSIONS

CRA has performed a Phase I Environmental Site Assessment of the industrial Property and buildings located at 1201 N. Magnolia Avenue in Anaheim, California in conformance with the scope and limitations of ASTM Practice E1527-00. Any exceptions to or deletions from this practice are described in Section 1.0 of this report. This assessment has identified the following recognized environmental conditions at this Site:

**PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST**

- Leaking USTs;
- Former Lead Reclamation Area;
- ASTs;
- Raw Material and Chemical Use and Storage;
- Battery Charging Tables;
- Used Oil Processing Area;
- Solid Wastes; and
- Spills/Releases of Lead Dust.

**PRIVILEGED AND CONFIDENTIAL  
PREPARED AT DELPHI CORPORATION'S COUNSEL'S REQUEST**

All of Which is Respectfully Submitted,  
CONESTOGA-ROVERS & ASSOCIATES

Erik A. Friedrich

Brian Boevers